

AARON D. FORD
Attorney General
Sabrena K. Clinton (Bar No. 6499)
Deputy Attorney General
State of Nevada
Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
(702) 486-3420 (phone)
(702) 486-3773 (fax)
sclinton@ag.nv.gov

*Attorneys for Non-party
Nevada Department of Corrections*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DELBERT M. GREENE,

Plaintiff,

v.

STATE OF NEVADA, *et al.*,

Defendants.

Case No. 2:19-cv-01529-APG-MDC

**NOTICE OF WITHDRAWAL OF
NEVADA DEPARTMENT OF
CORRECTIONS NOTICE OF
OBJECTIONS TO PLAINTIFF'S
SUBPOENA DUCES TECUM AND
MOTION TO QUASH OR MODIFY
SUBPOENA PURSUANT TO FRCP
45 (ECF NO. 94) AND STIPULATION
TO MODIFY SUBPOENA DUCES
TECUM**

Nevada Department of Corrections ("NDOC") and Plaintiff Delbert Greene, by and through counsel, submit this Notice of Withdrawal of Nevada Department Of Corrections' Notice of Objections to Plaintiff's Subpoena Duces Tecum and Motion to Quash or Modify Subpoena Pursuant to FRCP 45 (ECF No. 94) and Stipulation to Modify Subpoena Duces Tecum.

The parties have engaged in good faith communications in an effort to amicably resolve pending discovery disputes. Pursuant to those efforts, NDOC has agreed to withdraw its pending Notice of Objections to Plaintiff's Subpoena Duces Tecum and Motion to Quash or Modify Subpoena Pursuant to FRCP 45. The parties have stipulated that Plaintiff will modify its Subpoena Duces Tecum originally served on January 19, 2024 as follows:

- Requests 5-7 only shall seek information related to grievances, notifications to the parole board, and sentence restructuring;
- Requests 19, 20 and 22 only shall seek information on claims and settlement related to the conduct of NDOC employees acting in their official capacity;
- Requests 35-36 only shall seek grievance reports concerning inmate grievances related to sentences and sentencing; and
- The new date for responding to the Subpoena shall be March 2, 2024.

By entering into this Stipulation, NDOC does not waive any right to lodge objections contemporaneously with its production of any documents responsive to the Subpoena as modified or to seek a protective order or other relief from the Court. Nor does Plaintiff waive his right to seek relief from the Court via a motion to compel or other available relief concerning discovery disputes.

IT IS SO STIPULATED AND AGREED.

DATED this 15th day of February, 2024.

DATED this 15th day of February, 2024.

DICKINSON WRIGHT PLLC

**AARON D. FORD
ATTORNEY GENERAL**

/s/John L. Krieger

John L. Krieger, Esq. (Bar No. 6023)
3883 Howard Hughes Parkway, Suite 800
Las Vegas, Nevada 89169
Email: jkrieger@dickinson-wright.com

Attorneys for Plaintiff

/s/Sabrena K. Clinton

Sabrena K. Clinton, Esq. (Bar No. 6499)
Deputy Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
Email: sclinton@ag.nv.gov

*Attorney for Non-party Nevada Department
of Corrections*

ORDER

IT IS SO ORDERED.

DATED this 21st day of February, 2024.



**Maximiliano D. Couvillier III
UNITED STATES MAGISTRATE JUDGE**